

Exhibit H

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JOHN R. LA SALA

I, John R. La Sala, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

- I am more than 18 years of age and competent to testify in court to the matters stated below.

The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
- I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
- On September 11, 2001, I was arriving on the scene of Ground Zero when the terrorist attacks of the World Trade Center Towers occurred.
- On September 11, 2001 I was employed and working as a Fire Marshal of the Port Authority of New York and New Jersey.
- I was in New York at Ground Zero shortly after the first plane hit the first tower and as the second plane struck the second tower and I received physical injuries in the subsequent collapse of the towers and the connector between the financial center to the World Trade Center. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone.

Although I had been a police officer for many years by the day of the attack, when we were brutally attacked by terrorists my life was altered forever. I had never seen nor could I have imagined anything like it.

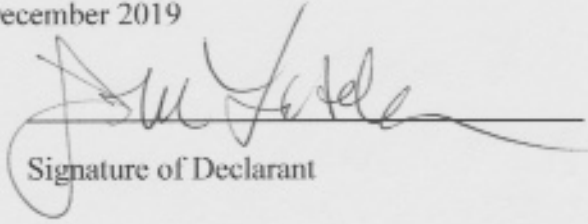
- As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: Severe, chronic lower back pain; extruded discs in back causing compression of nerve roots; radiculopathy; neuropathy; severe PTSD; depressive disorder; and anxiety disorder. As a result of my injuries, although I worked a few days after 9/11/2001, because of the injuries I suffered on that day I never worked again after that.
- The various sights, sounds, and traumas I witnessed on 9/11 led to PTSD I have suffered from ever since. On the morning of 9/11 I was working with a Junior Lieutenant. to give him basic knowledge of a fuel farm near La Guardia. I explained that the worst case scenario around fuel containers would be if plane hit the tanks— half of Queens would be incinerated. Ironically, it was only moments later that we heard the first plane hit the first tower. I went directly back to my station at La Guardia Airport where we mustered up and drove down in caravan to the World Trade Centers. When we got to Williamsburg Bridge, we heard the second plane strike. I knew we did not have equipment to fight jet fuel; I ordered the evacuation of my group, but the directive fell on deaf ears. We knew we needed to make a plan to go in and do a rescue operation as best as we could. I was running in to the scene when the connector from financial center to WTC collapsed on me. I was covered in debris and briefly lost consciousness. At this point, we had to retreat and regroup. I was then greeted by an EMS worker who took me to a van. I was completely covered in debris and had to be doused with saline to clear my breathing. I witnessed in horror both towers come down from my vantage point of being only a block or two away from the second

tower. At this point, I ran and jumped over barriers to help keep people back away from danger of site, and believe that is when I injured by back. I walked down to a precinct to check in with command, dressed in BDUs (Battle Dress Uniform). When I could not find anyone in the precinct, I went to the Brooklyn Bridge, but was deterred there as well. I then walked to the Williamsburg Bridge where a man in uniform stopped me and I was picked up by off duty anti-crime sergeant. I was sent to the hospital and was treated and released. I then went back to La Guardia and gave my story. I realized I was the only one that made it back from my rescue group. I reported back to work the next day for a junior assignment. But a couple days later I started to drag my leg due to the extreme back pain and experience the effects of PTSD.

- The effects of PTSD are still with me to this day. I was not able to sleep without nightmares. I have tried many treatments including seeing a Psychologist and taking prescribed anxiety and depression medications. These therapies were only minimally effective and I know the experience will never leave me.
- I sought and continue to seek medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.
- I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.
- I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 28 day of December 2019


Signature of Declarant

Exhibits Filed Under Seal